

United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

ENFORCEMENT CONFIDENTIAL

NEICVP0944E01

LABORATORY REPORT

ABC Coke
Tarrant, Alabama
NEIC Project No.: VP0944

July 2011

Principal Analytical Chemist:

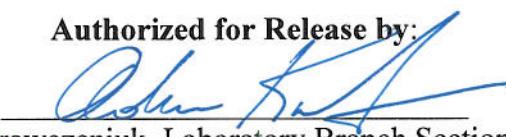


Linda Johnson

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LABORATORY ACTIVITIES REPORT

INTRODUCTION

The National Enforcement Investigations Center (NEIC) Laboratory Branch received 78 samples in May 2011 from Kristine Pordesimo, NEIC Field Branch, as part of a compliance inspection at ABC Coke in Tarrant, Alabama. Of the 78 samples, 61 were wastewater samples and 8 were process samples. Nine of the samples were trip blanks prepared by the NEIC laboratory and transported by the Field Branch to the sampling site, then shipped back to NEIC. The laboratory was initially requested to analyze the samples for benzene and naphthalene. Four of the wastewater samples tentatively identified to contain phenol were later qualitatively analyzed for phenol.

SAMPLE DELIVERY, RECEIPT AND TRANSFER

A copy of the chain-of-custody records is attached in **Appendix A**. Table 1 summarizes sample delivery, receipt and transfer. All samples were handled in accordance with the NEIC operating procedure *Evidence Management*, NEICPROC/00-059R3.

Table 1. SAMPLE DELIVERY, RECEIPT AND TRANSFER
ABC Coke
Tarrant, Alabama

Event	Date	Chain of Custody Record Nos.	Comment
Delivery/Receipt	5/6/11	N13181	One locked ice chest delivered to NEIC mail room by FedEx, tracking No. 867242723416. Shian Kung signed receiving log as recipient.
	5/11/11	N13182 N13185	One locked ice chest delivered to NEIC mail room by FedEx, tracking No. 874154119100. Shian Kung signed receiving log as recipient.
	5/11/11	N13183	One locked ice chest delivered to NEIC mail room by FedEx, tracking No. 874154119111. Shian Kung signed receiving log as recipient.
Transfer/Inspection/Storage	5/6/11	N13181	One locked ice chest transferred from Shian Kung to Linda Johnson. Linda Johnson unlocked the ice chest, inspected the contents. All samples were present and intact. Samples were placed in locked pelican cases in refrigerators in locked lab 1C-095.
	5/11/11	N13182 N13185	One locked ice chest transferred from Shian Kung to Linda Johnson. Linda Johnson unlocked the ice chest, inspected the contents. All samples were present and intact. Samples were placed in locked pelican cases in refrigerators in locked lab 1C-095.
	5/11/11	N13183	One locked ice chest transferred from Shian Kung to Linda Johnson. Linda Johnson unlocked the ice chest, inspected the contents. All samples were present and intact. Samples were placed in locked pelican cases in refrigerators in locked lab 1C-095.

ANALYTES, ANALYTICAL PROCEDURES AND ANALYSTS

All sample testing occurred in May and June 2011. Table 2 summarizes the samples from particular station numbers analyzed by particular analytical procedures and the analysts associated with the testing.

Table 2. ANALYTES, ANALYTICAL PROCEDURES AND ANALYSTS BY SAMPLE STATION

ABC Coke
Tarrant, Alabama

Sample Station Nos.	Analytes	Analytical Procedures/Methods	Analyst
1, 01, 2, 02, 4, 04, 5, 05, 6, 06, 7, 07, 9, 09, 10, 11	Benzene Naphthalene	SW-846 Methods 5030B/8260C, <i>Purge-and-Trap for Aqueous Samples/Volatile Organic Compounds by Gas Chromatograph/Mass Spectrometry (GC/MS)</i> <i>Volatile Organic Analysis by Gas Chromatography/Mass Spectrometry, NEICPROC/00-002R4</i>	Bob Bohn
03, 08	Benzene Naphthalene	SW-846 Methods 3585/5030B/8260C, <i>Waste Dilution for Volatile Organics/Purge-and-Trap for Aqueous Samples/Volatile Organic Compounds by Gas Chromatograph/Mass Spectrometry (GC/MS)</i>	Tam Talarski
2, 02, 9, 09	Phenol	SW-846 Methods 5030B/8260C, <i>Purge-and-Trap for Aqueous Samples/Volatile Organic Compounds by Gas Chromatograph/Mass Spectrometry (GC/MS)¹</i>	Linda Johnson

¹ Note that SW-846 does not recommend this methodology for phenol; there was insufficient time in the project schedule for the recommended methodology.

ANALYTICAL RESULTS

Table 3 contains the sample descriptions and summarizes the analytical results by station number and NEIC tag number. Concentrations are reported to three figures, consistent with the NEIC convention historically applied for similar projects; however, the uncertainty should be considered in determining significance of figures in the reported concentrations. The analytical uncertainties are estimated after analysis of all quality control data and performance criteria established in SW-846 Method 8260B. For the samples designated NE28601, NE28602, NE28626, and NE28627, the naphthalene expanded uncertainty is $(t/\sqrt{n}) \times \% \text{ RSD}$. For all other samples/analytes, the standard uncertainty is $20/\sqrt{3}$, where 20 is the allowed calibration verification percent drift criterion in Method 8260B. The uncertainty values, for benzene corresponding to NE28601, for example, should be read, "36.9 mg/L +/- 11.5 % of 36.9 mg/L." All analyses were performed in accordance with the NEIC quality system.

Table 3. ANALYTICAL RESULTS
ABC Coke
Tarrant, Alabama

Sample Station No. ¹ NEIC Tag No. ¹	Sampling Date ¹	Station Location ¹	Laboratory Sample Description	Analyte	Concentration (milligrams per liter [mg/L], unless noted otherwise)	Analytical Uncertainty (% of Reported Concentration)
1 NE28601	5/5/11	West Dirty Liquor Storage Tank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	36.9 36.5	11.5 59.1
1 NE 28602 ²	5/5/11	West Dirty Liquor Storage Tank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	41.5 26.2	11.5 59.1
01 (field replicate 1) NE 28646	5/9/11	West Dirty Liquor Storage Tank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	30.3 21.9	11.5 11.5
01 (field replicate 2) NE 28647	5/9/11	West Dirty Liquor Storage Tank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	30.1 23.8	11.5 11.5
01 (field replicate 3) NE 28628	5/10/11	West Dirty Liquor Storage Tank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	30.6 20.1	11.5 11.5
01 NE 28665	5/10/11	West Dirty Liquor Storage Tank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	31.8 25.0	11.5 11.5
01 NE 28667 ²	5/5/11	Ammonia Still Effluent	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	35.0 14.8	11.5 11.5
2 NE 28604	5/5/11	Ammonia Still Effluent	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Phenol	PNQ ³	NA ⁴
2 NE 28605	5/9/11	Ammonia Still Effluent	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	0.00132 ₅ < 0.001 ₅	11.5 NA ⁴
02 NE 28632	5/9/11	Ammonia Still Effluent	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	0.00419 0.00201	11.5 11.5

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Sample Station No. NEIC Tag No. ¹	Sampling Date ¹	Station Location ¹	Laboratory Sample Description	Analyte	Concentration (milligrams per liter [mg/L], unless noted otherwise)	Analytical Uncertainty (% of Reported Concentration)
02 NE 28633	5/9/11	Ammonia Still Effluent	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Phenol	PNQ ³	NA ⁴
03 NE28622	5/5/11	East Tar Decanter Sludge	20 mL clear bottle containing opaque, black, tarry sludge	Benzene Naphthalene	477 mg/Kg 16,600 mg/Kg	11.5 11.5
03 NE28626	5/9/11	East Tar Decanter Sludge	20 mL clear bottle containing opaque, black, tarry sludge	Benzene Naphthalene	388 mg/Kg 15,500 mg/Kg	11.5 45.9
03 NE28627 ²	5/9/11	East Tar Decanter Sludge	20 mL clear bottle containing opaque, black, tarry sludge	Benzene Naphthalene	432 mg/Kg 25,200 mg/Kg	11.5 45.9
4 NE 28607	5/5/11	Primary Cooler Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	22.8 47.0	11.5 11.5
04 NE 28634	5/9/11	Primary Cooler Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	25.1 40.7	11.5 11.5
04 NE 28635 ²	5/9/11	Primary Cooler Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	30.2 21.5	11.5 11.5
5 NE 28610	5/5/11	Dirty Water Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	44.9 257	11.5 11.5
05 NE 28637	5/9/11	Dirty Water Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	328 396	11.5 11.5
6 NE 28613	5/5/11	Naphthalene Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	168 85.0	11.5 11.5

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Sample Station No. ¹ NEIC Tag No. ¹	Sampling Date ¹	Station Location ¹	Laboratory Sample Description	Analyte	Concentration (milligrams per liter [mg/L], unless noted otherwise)	Analytical Uncertainty (% of Reported Concentration)
06 NE 28640	5/9/11	Naphthalene Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	178 26.3	11.5 11.5
7 NE 28616	5/5/11	Cast Drip Pot Between Saturator and Tar Bottom Final Cooler	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	52.2 391	11.5 11.5
07 NE 28648	5/9/11	Cast Drip Pot Between Saturator and Tar Bottom Final Cooler	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	47.2 51.6	11.5 11.5
08 NE28624	5/9/11	Thickener Top Layer	20 mL clear bottle containing opaque, black, tarry sludge	Benzene Naphthalene	0.310 mg/Kg 17.3 mg/Kg	11.5 11.5
08 (Top Phase) ⁶ NE28674 NE28675	5/10/11	Thickener Top Layer	21 g - opaque, gray, sludge	Benzene Naphthalene	0.339 mg/Kg 20.1 mg/Kg	11.5 11.5
08 (Bottom Phase) ⁶ NE28674 NE28675	5/10/11	Thickener Top Layer	29 g - clear brown liquid with a small, top layer of gray emulsion	Benzene Naphthalene	<0.025 0.121	11.5 11.5
09 NE 28643	5/9/11	Thickener – Lower Layer	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Phenol	<10	NA ⁴
09 NE 28644	5/9/11	Thickener – Lower Layer	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	< 0.100 0.115	NA ⁴ 11.5
9 NE 28668	5/10/11	Thickener – Lower Layer	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene Phenol	< 0.050 0.055 <10	NA ⁴ 11.5 NA ⁴
10 NE 28656	5/9/11	Liquor Storage Containment Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	13.4 21.1	11.5 11.5

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ABC Coke
Tarrant, Alabama

Sample Station No. ¹ NEIC Tag No. ¹	Sampling Date ¹	Station Location ¹	Laboratory Sample Description	Analyte	Concentration (milligrams per liter [mg/L], unless noted otherwise)	Analytical Uncertainty (% of Reported Concentration)
10 (field replicate 1) NE 28660	5/10/11	Liquor Storage Containment Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	14.7 25.8	11.5 11.5
10 (field replicate 2) NE 28661	5/10/11	Liquor Storage Containment Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	17.1 20.2	11.5 11.5
10 (field replicate 3) NE 28662	5/10/11	Liquor Storage Containment Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	16.5 27.7	11.5 11.5
10 (field replicate 4) NE 28663	5/10/11	Liquor Storage Containment Sump	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	15.9 25.8	11.5 11.5
11 NE 28652	5/9/11	BTX Tank Overflow	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	> CR ⁷ < 5.00	11.5 NA ⁴
11 NE 28654	5/9/11	BTX Tank Overflow	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	1340 < 25.0	11.5 NA ⁴
11 NE 28598	5/10/11	BTX Tank Overflow	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	> CR ⁷ < 5.0	11.5 NA ⁴
11 NE 28658	5/10/11	BTX Tank Overflow	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	1300 < 12.5	11.5 NA ⁴
11 NE 28659	5/10/11	BTX Tank Overflow	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	1330 < 25.0	11.5 NA ⁴
NE 28619	5/5/11	Trip Blank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	< 0.001 < 0.001	NA ⁴ NA ⁴

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Sample Station No. NEIC Tag No. ¹	Sampling Date ¹	Station Location ¹	Laboratory Sample Description	Analyte	Concentration (milligrams per liter [mg/L], unless noted otherwise)	Analytical Uncertainty (% of Reported Concentration)
NE 28599	5/9/11	Trip Blank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	< 0.001 < 0.001	NA ⁴ NA ⁴
NE 28671	5/10/11	Trip Blank	40 mL amber bottle containing liquid of undiscerned color, opacity, and viscosity	Benzene Naphthalene	< 0.001 < 0.001	NA ⁴ NA ⁴

¹ Information is from the chain-of-custody record (Appendix A).

² Results corresponding to this tag number are based on three within-bottle measurements.

³ Present but not quantified.

⁴ Not applicable.

⁵ "<>" means the analyte was not detected at or above the numerical quantitation limit indicated; this number is the lowest calibration standard concentration multiplied by the sample dilution factor.

⁶ After discussing with the project manager, the nature of these two samples, they were combined into one sample, then phase separated prior to analysis.

⁷ This value is above the calibration range, therefore, is not reported.

APPENDIX A
CHAIN-OF-CUSTODY RECORDS
(4 pages)

**ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement and Compliance Monitoring**
**NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
Building 53, Box 25227, Denver Federal Center
Denver, Colorado 80225**
CHAIN OF CUSTODY RECORD

PROJECT NAME		STATION LOCATION				NO. OF CONTAINERS	TAG NUMBERS		SAMPLE TAG VERIFICATION	REMARKS
PROJ NO: <i>1PUG4</i>	ABC Coke									
SAMPLERS: (Signature) Kristine Bordesimo	<i>Kristine Bordesimo</i>									
STA. NO.	DATE	TIME	COMB	GRAB						
1	5/5/11	14:10	✓	West Dirty Liquor Storage Tank	3		NE 28601, 28603, 28603	✓	(C)	
2	5/5/11	14:25	✓	Ammonia Still Effluent	3	✓	NE 28604, 28605, 28604	✓	9286769136*	*on cap indicates some darker color sample
4	5/5/11	14:55	✓	Primary Cooler Sump	3	✓	NE 28607, 28608, 28609	✓		
5	5/5/11	15:15	✓	Dirty Water Sump	3	✓	NE 28610, 28611, 28612	✓	1	
6	5/5/11	16:30	✓	Naphthalene Sump	3	✓	NE 28613, 28614, 28615	✓	928676914*	
7	5/5/11	15:55	✓	Last Drip Pot Between Saturator + Tar Bottom Final Cooler	3	✓	NE 28616, 28617, 28618	✓	928676912*	
Blank	5/5/11			Trip Blanks	3	✓	NE 28619, 28620, 28621	✓	928676915	
Relinquished by: (Signature)		Date / Time	Received by: (Signature)				Relinquished by: (Signature)		Received by: (Signature)	
<i>Kristine Bordesimo</i>		5/5/11 17:45								
Relinquished by: (Signature)		Date / Time	Received by: (Signature)				Relinquished by: (Signature)		Received by: (Signature)	
<i>Kristine Bordesimo</i>										
Relinquished by: (Signature)		Date / Time	Received for Laboratory by:	(Signature)	Date / Time	Remarks				
<i>Kristine Bordesimo</i>		5/6/2011 11:40 AM	<i>John Johnson</i>		5/6/2011 11:40 AM	FedEx # 8672 4272 3416 ✓ 928676912*				
Relinquished by: (Signature)		Date / Time	Received by: (Signature)				Date / Time	Received by: (Signature)		
<i>Kristine Bordesimo</i>										
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ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement and Compliance Monitoring

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
Building 53, Box 25227, Denver Federal Center
Denver, Colorado 80225

CHAIN OF CUSTODY RECORD

PROJ. NO.	PROJECT NAME	STATION NO.	DATE	TIME	CO _{MP}	GRAB	STATION LOCATION	NO. OF CON. CONTAINERS	TAG NUMBERS	SAMPLE TAG VERIFICATION	REMARKS
VPO944	ABC Coke	01	5/9/11	1505	✓	West Dirty Liquor Storage Tank	5	✓	NE 23646, 38647 NE 28628, 28639, 28630	✓	Spec/Bag # 88886767618*
	<i>Huthin Puddester</i>	02	5/9/11	1530	✓	Ammonia Sulfate Effluent	3	✓	NE 23631, 23632, 38633	✓	988676916*
		04	5/9/11	1600	✓	Rinse of Cooler Sump	3	✓	NE 23634, 28635, 28636	✓	988676917②
		05	5/9/11	1615	✓	Dirty Water Sump	3	✓	NE 28637, 28638, 28637	✓	②
		06	5/9/11	1630	✓	NaOH/Ca(OH)2 Sump	3	✓	NE 28640, 28641, 28642	✓	988676919
		07	5/9/11	1625	✓	Cast Agg Pot Between Sump & Tar Pothole Final Cooler	3	✓	NE 28648, 28649, 28650	✓	988676921
		09	5/9/11	1430	✓	Thickener - Lower Layer	3	✓	NE 23643, 38649, 28645	✓	Sample w/ X has stained skin layer slightly
		10	5/9/11	1515	✓	Liquor Storage Containment Sump	3	✓	NE 28655, 28656, 28657	✓	988676920 1
		11	5/9/11	1640	✓	BTX Tank overflow	3	✓	NE 23652, 28653, 28654	✓	988676916*
		Blank	5/9/11			• Trip Blanks	3	✓	NE 28651, 28650, 28651	✓	1
<hr/>											
Relinquished by: <i>(Signature)</i>							Date / Time	Received by: <i>(Signature)</i>	Date / Time	Received by: <i>(Signature)</i>	
<i>Huthin Puddester</i>							5/10/11 1700				
Relinquished by: <i>(Signature)</i>							Date / Time	Received by: <i>(Signature)</i>	Date / Time	Received by: <i>(Signature)</i>	
Relinquished by: <i>(Signature)</i>							Date / Time	Received for Laboratory by: <i>(Signature)</i>	Date / Time	Remarks	
								<i>Dinda John</i>			
Relinquished by: <i>(Signature)</i>							5/11-11	1:32 AM			

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Office of Enforcement and Compliance Monitoring

NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
Building 53, Box 25227, Denver Federal Center

CHAIN OF CUSTODY RECORD											
PROJ. NO.	PROJECT NAME				NO. OF CONTAINERS		TAG NUMBERS			REMARKS	
		STATION NO.	DATE	TIME	COMPL.	GRAB	STATION LOCATION	CON-	TAINERS	SAMPLE TAG VERIFICATION	
1P0944	ABC Coke	03	5/5/11	14:35	✓	East Tar Decanter	Sludge	2	✓	NE 28622, 28623	✓ 988676372
	J. Justin D. Bodding	03	5/9/11	15:40	✓	East Tar Decanter	Sludge	2	✓	NE 28624, 28625	✓ 988676366
		08	5/9/11	14:15	✓	Thicker Top Layer	v	2	✓	NE 28626, 28627	✓ 988676372
		08	5/10/11	9:50	✓	Thicker Top Layer	v	2	✓	NE 28624, 28625	✓ 988676370
<i>8ml DIALS SPLASHES</i>											
Relinquished by: (Signature)				Date / Time	Received by:	(Signature)	Relinquished by:	(Signature)	Date / Time	Received by:	(Signature)
Relinquished by: (Signature)				Date / Time	Received by:	(Signature)	Relinquished by:	(Signature)	Date / Time	Received by:	(Signature)
Relinquished by: (Signature)				Date / Time	Received for Laboratory by:	(Signature)	Remarks	All samples present, intact. Tag numbers for East Tar Decanter Sludge (5/9/11) and for Thicker Top Layer (5/10/11) were misrecorded on site as indicated above.			
Relinquished by: (Signature)				Date / Time	Received for Laboratory by:	(Signature)	Remarks	ABC Coke Target, Alabama 1-21-83			

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NEICVP0944E01

Appendix A
Page 3 of 4

✓ ABC Coke Target, Alabama 1-21-83

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J. Justin D. Bodding

